



Order Filed on September 7, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Robertson, Anschutz, Schneid, Crane & Partners, PLLC
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Attorneys for Secured Creditor

Harold N. Kaplan (HK-0226)

In Re:

Timothy M. Myers aka Tim Myers

dba Area 51 Lawn and Landscaping, LLC,

Debtor.

Case No.: 22-12461-ABA

Chapter: 13


Hearing Date: August 23, 2022

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: September 7, 2022



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR ASSET BACKED SECURITIES CORPORATION HOME EQUITY LOAN TRUST, SERIES NC 2006-HE2 ASSET BACKED PASS-THROUGH CERTIFICATES, SERIES NC 2006-HE2

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Debtors' Counsel: Andrew Thomas Archer

Property Involved ("Collateral"): 62 Payson Avenue, Audubon, N.J. 08106.

Relief sought: ■ Motion for relief from the automatic stay

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 04 months from 05/01/2022 through 08/01/2022.
- The Debtor is overdue for 04 payments from 05/01/2022 through 08/01/2022 at \$1,266.76 per month.

Funds Held In Suspense \$233.24.

Total Arrearages Due \$4,833.80.

2. Debtor must cure all post-petition arrearages, as follows:

- Immediate payment shall be made in the amount of \$4,833.80. Payment shall be made on or before 08/31/2022.
- Beginning on 09/01/2022, regular monthly mortgage payments shall continue to be made in the amount of \$1,266.76.

3. Payments to the Secured Creditor shall be made to the following address(es):

- Regular monthly payment: PHH Mortgage Services
Mailstop SBRP
PO Box 5469
Mt. Laurel, NJ 08054
- Monthly cure payment: PHH Mortgage Services
Mailstop SBRP
PO Box 5469
Mt. Laurel, NJ 08054

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

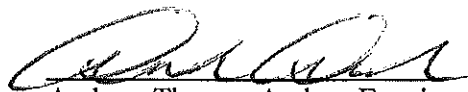
5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

The fees and costs are payable:

■ Through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order.



Andrew Thomas Archer, Esquire.
Attorney for Debtor(s)

Date: 9/6/22

/s/Harold N. Kaplan

Harold N. Kaplan, Esquire.
Attorney for Secured Creditor

Date: 9/6/2022